

Exhibit “A”

Part 1

Bardsley, Benedict + Cholden, LLP

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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

DAS ARCHITECTS, INC., Plaintiff	:	CIVIL ACTION NO. 20-1276
	:	
vs.	:	
	:	
CHRIS RAHN AND CHRISTINE	:	
PASIEKA, Defendants	:	

PLAINTIFF DAS ARCHITECTS, INC.'S INTERROGATORIES
FOR DISCOVERY OF ASSETS IN AID OF EXECUTION
DIRECTED AT DEFENDANT CHRIS RAHN

To: **Chris Rahn**
c/o Jon Taylor, Esquire
Law Offices of Jon Taylor, Esquire
1617 John F. Kennedy Boulevard – Suite 1838
Philadelphia, PA 19103

Plaintiff, DAS Architects, Inc. by and through its attorneys, *Bardsley, Benedict + Cholden, LLP*, hereby serves the within Interrogatories for Discovery of Assets in Aid of Execution Directed at Defendant Chris Rahn pursuant to Federal Rule of Civil Procedure 69.

These Interrogatories are to be answered separately and under oath by each party above-named, within fifteen (15) days of entrance of the Order of the Court granting Plaintiff's Motion to Enforce Settlement and Entry of Judgment. These Interrogatories are deemed to be continuing in the event that You or Your representatives (including counsel) learn additional facts not set forth in the Answers or discover that information given in response to any of the Interrogatories is

incorrect or incomplete. Such supplemental Answers may be filed from time to time, but in no event later than fourteen (14) days after such further information is received. These Interrogatories are subject to the following instructions and definitions, each of which is to be deemed to be incorporated within each of the following Interrogatories:

INSTRUCTIONS

1. The fact that an investigation is continuing or that discovery is not complete shall not constitute cause for failing to answer any Interrogatory as fully as possible.

2. If You claim in Your Answer to any Interrogatory herein that any requested document is “privileged” or otherwise not subject to discovery pursuant to the Federal Rules of Civil Procedure, describe the document for which You claim privilege or protection and state the legal and factual basis for Your claim of privilege or protection. Also, identify by name, title, and business and home address of all custodians of the referenced document and copies thereof.

3. If any document requested herein was formerly in Your possession, custody, or control and has been lost or destroyed, You are requested to submit in lieu of each document a written statement which:

- a. Describes in detail the nature of the document and its contents;
- b. Identifies the person who prepared or authored the document, and, if applicable, the person to whom the document was sent;
- c. Specifies the date on which the document was prepared or transmitted or both; and,
- d. Specifies, if possible, the date on which the document was lost or destroyed, and if destroyed, the conditions of, or reasons for, such destruction and the persons requesting and performing the destruction.

4. The space provided after each Interrogatory should in no way limit your Answer.

If the space provided for Your Answer is inadequate, attach a separate sheet of paper so that a full and complete answer may be given.

DEFINITIONS

1. The terms “You”, “Your”, or other reference to anyone whom these Interrogatories are directed shall mean Defendant Chris Rahn.

INTERROGATORIES

1. State whether you are currently employed. If so, state the name and address of your employer(s) and whether you are paid weekly, bi-weekly, monthly, or in some other fashion. If you are self-employed, state the name of your business, address, nature of your business and annual income.

ANSWER:

2. **ACCOUNTS:** State whether or not you maintain any checking or savings accounts. If so, state the name and location of the banks or savings and loan association or building and loan association or credit union and the branch or branches thereof, the identification (account) numbers of each account, and the amount or amounts you have in each account. If you maintain any of these jointly with another person, give their name and address. Also provide the above information with respect to any such bank accounts which were maintained and which were closed since January 1, 2018.

ANSWER:

3. **REAL ESTATE:** Do you have an ownership or interest in any real estate anywhere in the United States? If so, set forth a brief description thereof, including the lot size and type of construction; the location, including the state, county, and municipality; the volume and page number of the official record; and state further whether you own it solely or together with any other person or persons and give their full names and addresses. If any of the above properties are mortgaged, supply the names and addresses of the lender(s), the date and amount of the mortgage, where it is recorded, the monthly payments and the balance now due.

ANSWER:

4. **DEBTS, NOTES and JUDGMENTS:** State the names and addresses of any and

all persons whom you believe owe you money and set forth in detail the amount of money owed, the terms of payment and whether or not you have written evidence of this indebtedness, and if so, the location of such writing. Also state if the matter is in litigation, and if so, give full details. If you hold a judgment or judgments as security for any of these debts, state where and when the judgment was recorded; and the county, number and term where the judgment is recorded. If you hold this judgment jointly with any other person or persons, give their full names and addresses.

ANSWER:

5. **INSURANCE:** State whether or not you are the owner of any life insurance contracts. If so, state the serial or policy number or numbers of said contract, the face amount, the exact name and address of the insurance company, the named beneficiary or beneficiaries and their present address. If you own this insurance jointly with any other person or persons, give their full names and addresses.

ANSWER:

6. **MORTGAGES:** State whether you own any mortgages against real estate owned by any other person in the United States. If so, state whether or not you own this mortgage with any other person or persons and, if so, supply their full names and addresses. State also the names and addresses of all borrowers and the state and county where said mortgage is recorded together with the number of the volume and the page number.

ANSWER:

7. **AGREEMENTS:** State whether you have any agreements involving the purchase of any real estate anywhere in the United States. If so, state with whom this agreement is made, and state whether or not any persons are joined with you in the agreement. Supply full names and addresses of all parties concerned. If the agreement is recorded, provide the state and county of recordation, volume and page numbers.

ANSWER:

8. **STOCKS, SHARES OR INTERESTS:** State whether or not you own any stocks, shares or interests in any corporation, or unincorporated association or partnership, limited or general and state the location thereof. Include the names and addresses of the organizations and include the serial numbers of the shares or stock. If you own any of the stock, shares or interests jointly with any other person or persons, give their full names and addresses.

ANSWER:

9. **GOVERNMENT, MUNICIPAL OR CORPORATE BONDS:** State whether or not you own individually or jointly any corporate or governmental bonds including U.S. Savings Bonds. If so, include the face amount, serial numbers and maturity date and state the present location thereof. If you own any of these bonds jointly with any other person or persons, give their full names and addresses.

ANSWER:

10. **SAFETY DEPOSIT BOXES:** State whether or not you maintain any safety deposit box or boxes. If so, include the names of the bank or banks, branch or branches, and the identification number of other designation of the box or boxes. Include a full description of the contents and also the amount of cash among those contents. If you maintain any of these jointly with another person, give their full name and address.

ANSWER:

11. **TRANSFERRED ASSETS AND GIFTS:** If, since January 1, 2018, you have transferred any assets (real property, personal property, chose in action) to any person and/or, if you have given any gift of any assets, including money, to any person, set forth, in detail, a description of the property, the type of transaction, and the name and address of the transferee or recipient.

ANSWER:

12. **INHERITANCE:** State whether or not, to your knowledge, you are now or will be a beneficiary of or will inherit any money from any decedent in the United States, and state the place and date of death, the legal representative of the estate, and the location of the court where the said estate is administered or to be administered.

ANSWER:

13. **ANNUITIES:** State whether you are a beneficiary of any trust fund, and if so, state the names and addresses of the trustees and the amount of the payment and when the payment is received.

ANSWER:

14. **PERSONAL PROPERTY:** Set forth a full description of all furnishings and other items of personal property (including jewelry) with full description, value and present location. State also whether or not there are any encumbrances against that property and if so, the name and address of the encumbrance holder, the date of the encumbrance, the original amount of that encumbrance, the present balance of that encumbrance and the transaction which gave rise to the existence of the encumbrance. If you own any personal property jointly with any other person or persons, give their names and addresses.

ANSWER:

15. **RENTAL INCOME:** State whether you are the recipient, directly or indirectly, of any income for the rental of any real or personal property; and if so, state specifically the source of payment, the person from whom such payments are received and the amount and date when those payments are received.

ANSWER:

16. **MOTOR VEHICLES:** State whether or not you own any motor vehicles. Include a full description of such motor vehicles including color, model, title number, serial number and registration plate number. Also show the exact name or names in which the motor vehicles are registered, the present value of those motor vehicles and their present location and place of regular storage or parking. State also whether or not there are any liens or encumbrances against those motor vehicles and if so, the name and address of the encumbrance holder, the present balance of the encumbrance and the transaction that gave rise to the existence of the encumbrance.

ANSWER:

17. **PENSION:** State whether you are a participant in or the recipient of any pension or annuity fund, and if so, state specifically the source of payment, the person to whom such payments are made, the amount of the payments and date when those payments are received.

ANSWER:

18. **OTHER ASSETS:** If you have any asset or assets that are not disclosed in the preceding seventeen interrogatories, please set forth all details concerning those assets.

ANSWER:

19. State the names, titles, addresses and telephone numbers of all persons who assisted the Company in the preparation of the answers to the foregoing interrogatories.

ANSWER:

Bardsley, Benedict + Cholden, LLP

By: 

Sean C. Ryan, Esquire
Attorneys for Plaintiff

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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DAS ARCHITECTS, INC., Plaintiff

vs.

CHRIS RAHN and CHRISTINE
PASIEKA, Defendants.

:
: No. 2:20-cv-01276-GJP
:
:
:
:
:

CERTIFICATE OF SERVICE

I, Sean C. Ryan, Esquire, counsel for Plaintiff, certify that a true and correct copy of the foregoing Plaintiff DAS Architects, Inc.'s Interrogatories For Discovery Of Assets In Aid Of Execution Directed At Defendant Chris Rahn was served by electronic mail to the following.

Jon Taylor, Esquire
The Law Offices of Jon Taylor, Esquire, P.C
1617 John F. Kennedy Boulevard
Suite 1838
Philadelphia, PA 19103

Bardsley, Benedict + Cholden, LLP

By: _____



Sean C. Ryan, Esquire